

September 30, 2016

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463.

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FEDERAL ELECTION
COMMISSION

2016 OCT -3 PM 3:19

MUR # 7144

OFFICE OF GENERAL
COUNSEL

To Whom it May Concern:

I, Beatriz LeBron, believe that Christopher L. Jacobs and Martina V. Rehorik have conspired to violate federal election law. Mr. Jacobs used Ms. Rehorik, with whom he has a long established personal and professional relationship, to violate campaign finance limits for the 2016 presidential primary. Additionally, as Ms. Rehorik was born outside of the United States she may be a foreign national and thereby ineligible to make contributions to a federal candidate.

Mr. Jacobs contributed \$2,700 to Mr. Bush on 6/29/15 (on that filing he listed his employer as Erie County and his title as Government). On 7/15/15, a campaign fundraising deadline imposed by the FEC, Ms. Rehorik also contributed \$2,700 to Mr. Bush. On the filing, Erie County is listed as her employer and her title reads County Clerk. In actuality, Mr. Jacobs is the County Clerk of Erie County and he has previously filed with the FEC using County Clerk as his official title (per his 3/10/16 contribution of \$1,250 to the NYS Republican Federal Campaign Committee). Ms. Rehorik's use of Mr. Jacobs' title appears to be a way for Mr. Jacobs to let the Bush campaign know that the contribution was made on his behalf. Since Mr. Jacobs and Ms. Rehorik are not married the rule that one spouse may use another spouse's income to make federal contributions without violating established limits does not apply.

It is unlikely that Ms. Rehorik would be able to make such a large contribution as her public salary was listed as \$41,317, and the \$2,700 is out of character with previous contributions. Even factoring in the \$9,658.24 she received as compensation from Friends of Chris Jacobs between 2011-2014 and potential income she received for work conducted at Avalon Development, owned by Mr. Jacobs. She has no other federal contributions and \$2,700 is more than 15 times greater than her previous contributions. Such a financial pass through is unethical and illegal. Furthermore, if Mr. Jacobs knowingly gave money to a foreign national, who was also his employee, to make a federal contribution on his behalf then he may have violated other statutes.

Furthermore, Mr. Jacobs and Ms. Rehorik use different addresses for many of their state and federal contributions which may be an attempt to obscure the nature of their personal and professional relationship. On the 7/15/15 filing Ms. Rehorik uses PO Box 862 in Buffalo when both of them use the home address of 42 Saybrook Place in Buffalo (owned and used as a primary residence by Mr. Jacobs) in many other instances, including Mr. Jacobs 6/29/15 contribution to Mr. Bush and Ms. Rehorik's 9/9/15 contribution of \$50 to the Buffalo Republican Committee.

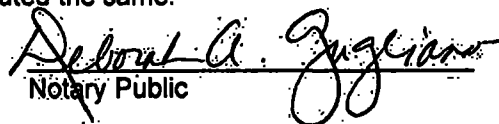
Sincerely,


Beatriz LeBron

Rochester NY 14608

On this 30 day of September, 2016 before me personally came Beatriz LeBron who is to me known and known to me to be the person described in and who executed the foregoing instrument and, being by me duly sworn, did depose and say that the information in this document is known to her to be true and accurate, and that she duly acknowledged to me that she executed the same.

DEBORAH A GAGLIANO
NOTARY PUBLIC-STATE OF NEW YORK
No. 01GA6184374
Qualified in Monroe County
My Commission Expires April 07, 2020


Notary Public